

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION**

PRESIDENT DONALD J. TRUMP,
45th President of the United States of
America, in his individual capacity,

Plaintiff,

v.

SIMON & SCHUSTER, INC., a New
York corporation, ROBERT
WOODWARD p.k.a. BOB
WOODWARD, an individual, and
PARAMOUNT GLOBAL, a Delaware
corporation f/k/a VIACOMCBS, INC., a
Delaware corporation, f/k/a Viacom Inc.,
successor by merger to CBSCorporation,
a Pennsylvania corporation f/k/a
Westinghouse Electric Corporation,

Defendants.

Civil Action Number:
3:23-cv-02333-MCR-ZCB

**DECLARATION OF BOB
WOODWARD IN SUPPORT
OF THE MOTION TO
DISMISS, OR IN THE
ALTERNATIVE, TO
TRANSFER FOR IMPROPER
VENUE**

Bob Woodward, pursuant to 28 U.S.C. § 1746, declares and says the
following under penalty of perjury:

1. I make this declaration based on my personal knowledge, except
where otherwise stated. I am over the age of 18 years and am fully competent to
testify to the matters stated in this declaration.

2. I am an investigative journalist and author. I live and work in Washington, D.C. I have worked as a reporter with *The Washington Post* since 1971. Based on my reporting, I have authored over 22 books, including *All the President's Men*, which told the personal investigative reporting story of Carl Bernstein and myself as we covered Watergate for *The Washington Post*. I have written books about every president since Nixon, including our current president, President Biden. I interviewed Presidents Carter, Clinton, George W. Bush, Obama, and Trump in the Oval Office.

3. Most recently, I covered the Trump Administration and authored four books based on my reporting: *Fear: Trump in the White House*, *Rage*, *Peril*, and *The Trump Tapes: The Historical Record*.

4. All of these books have been published by Simon & Schuster ("S&S"), a book publisher based in New York City.

5. To my knowledge, the S&S employees who worked on *The Trump Tapes: The Historical Record* (the "Work") are based out of the New York City office, unless otherwise stated, according to information I have received from S&S. I am also informed that no Paramount employees were involved in the creation or publication of the Work.

6. I interviewed President Trump on 19 occasions between December 2019 and August 2020 (the “Interviews”). These Interviews were used and quoted extensively in *Rage* and were expanded upon in the Work.

7. Before beginning the Interviews, I explained to President Trump that the Interviews would be used in my next book, which would come out in the Fall of 2020. I made no other promises about the book or Interviews, and he made no requests beyond clarifications that the Interviews would not be used in contemporaneous reporting in *The Washington Post*.

8. I conducted three of the Interviews in person. The first took place at the White House in the Oval Office on December 5, 2019. Senator Lindsey Graham, Senior Political Counselor Kellyanne Conway, Deputy Press Secretary Hogan Gidley, and Chief of Staff Mick Mulvaney were all present during the Interview. Vice President Pence later entered the Oval Office and stayed until the conclusion of the interview. *See* Appendix A for a full summary of the Interview locations and attendees.

9. The second interview also took place at the White House on December 13, 2019. Deputy Press Secretary Hogan Gidley and Deputy Chief of Staff for Communications Dan Scavino, Special Assistant to the President and Deputy Press Secretary Judd Deere were present. *See* Appendix A.

10. The third interview took place at President Trump's Mar-a-Lago residence, in Palm Beach, Florida on December 30, 2019. Hogan Gidley and Dan Scavino were present for at least portions of the Interview. *See* Appendix A.

11. In 2020, and especially after the COVID-19 pandemic began, I conducted the remaining Interviews by phone. I had a contact number (with a Washington, D.C. area code) for Molly Michael, Special Assistant to the President and Oval Office Operations Coordinator, who would put me through to President Trump. I made all these calls from my home or office in Washington, D.C.

12. On some occasions, President Trump called me at my home in Washington, D.C.

13. From my own reporting and a review of reporting by other reporters who cover the White House, it appears President Trump was in Washington, D.C. for every conversation, except one. On February 19, 2020, the switchboard operator connected me to the President while he was on Air Force One. Jared Kushner was also present during this interview. *See* Appendix A.

14. I also interviewed National Security Advisor Robert O'Brien and Deputy National Security Advisor Matthew Pottinger in May and June of 2020 and excerpts of those interviews were included in the Work. I conducted those interviews at the Executive Office Building in Washington, D.C., at the White House, and by phone. *See* Appendix A.

15. The last Interview with President Trump took place by phone on August 14, 2020.

16. *Rage* was published in September 2020—four weeks later. When *Rage* was released, S&S and I made available about 30 minutes of excerpts from the tapes of the Interviews, which were included in various news reporting concerning *Rage*. *The Washington Post*—as well as CNN and other news sites—included those excerpts on its website.

17. Upon reviewing the Interviews, in early 2022, I decided that the public and the historical record would be well served by hearing the recordings of the Interviews.

18. I used the Interviews with President Trump in *Rage* and incorporated edited versions of the Interviews in the Work.

19. I also included in the Work my first interview with President Trump in March 2016. Robert Costa, a *Washington Post* reporter, and I conducted the interview at the Old Post Office Pavilion Trump Hotel in Washington, D.C. Hope Hicks, Corey Lewandowski, and Donald Trump, Jr. were present. A transcript of this interview was published by *The Washington Post* in April 2016.

20. I wrote and edited all the 227 commentaries included in the Work, as well as its Introduction and Epilogue, in Washington, D.C.

21. I worked with the independent contractors and S&S employees who helped me create *The Trump Tapes: The Historical Record* in Washington, D.C. or New York.

22. Karen Pearlman was the producer and director of *The Trump Tapes* audiobook. She works in New York. Elisa Shokoff is an employee of Simon & Schuster and was an executive producer of *Work*. I am informed she works in New York.

23. Claire McMullen, my full-time assistant, was my collaborator for the *Work* and a producer and director of the audiobook. She works in Washington D.C.

24. Jonathan Karp is the CEO of Simon & Schuster and works in New York.

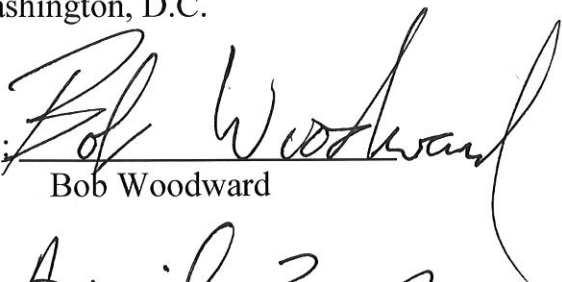
25. Chris Lynch, the president and publisher of Simon & Schuster Audio, also works in New York.

26. Studio recording for *The Trump Tapes* was done by Terry Hogan and Andre Bellido of S&S in New York, and by Harry Evans and Mike Goehler of Clean Cuts at Three Seas in Washington D.C.

27. Post production was handled by Hudson Sound in New York.

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge and belief.

Executed this RD3_h day of April 2023 in Washington, D.C.

By: 
Bob Woodward
